

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-30070KPN

PETER K. FREI,)
Plaintiff)
)
vs.)
)
TOWN OF HOLLAND, BOARD OF HEALTH,)
HOLLAND CONSERVATION COMMISSION,)
HOLLAND POLICE DEPARTMENT,)
PLANNING BOARD, ZONING BOARD OF)
APPEALS, Ronald Benoit, Debra Benveniste,)
Sally Blais, Richard Blease, Harold E. Congdon,)
Robert Dymon, Robert Ford, Kevin Gleason,)
Benjamin Haller, William Hardy, Earl Johnson,)
Helen Kreiger, Marilyn LaPlante, Joanne May,)
Vincent J. McCaughey, Dora Metrelis,)
Arthur A. Quinn, Brian Roche, John Stevens,)
Defendants)

DEFENDANTS' ANSWER TO PLAINTIFF'S AMENDED
COMPLAINT AND CLAIM FOR JURY TRIAL

AS TO INTRODUCTION

To the extent that the answers are required to the statements in the Introduction to the Plaintiff's Amended Complaint, the defendants admit the allegations contained in paragraph 1 of the Introduction to the plaintiff's Introduction.

The defendants neither admit nor deny the allegations contained in paragraph 2 of the Introduction to the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. To the extent that paragraph 2 of the Introduction alleges any wrongdoing on the part of the defendants, the defendants deny.

The defendants deny the allegations contained in paragraph 3 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 4 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 5 of the Introduction to the plaintiff's complaint.

The defendants admit the allegations contained in the first sentence of paragraph 6 of the Introduction to the plaintiff's complaint. The defendants deny the balance of the allegations contained in paragraph 6 of the plaintiff's Introduction.

The defendants deny the allegations contained in paragraph 7 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 8 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 9 of the Introduction to the plaintiff's complaint.

The defendants admit the allegations contained in paragraph 10 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 11 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 12 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 13 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 14 of the Introduction to the plaintiff's complaint.

The defendants deny the allegations contained in paragraph 15 of the Introduction to the plaintiff's complaint.

The defendants neither admit nor deny the allegations contained in paragraph 16 of the Introduction to the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

AS TO PARTIES

1. The defendants admit the allegations contained in paragraph 1 of the plaintiff's Complaint.

2. The defendants admit the allegations contained in paragraph 2 of the plaintiff's Complaint.

3. The defendants deny the allegations contained in the first sentence of paragraph 3 of the plaintiff's Complaint. The defendants admit the balance of the allegations in paragraph 3.

4. The defendants deny the allegations contained in the first sentence of paragraph 4 of the plaintiff's Complaint. The defendants admit the balance of the allegations in paragraph 4.

5. The defendants deny the allegations contained in the first sentence of paragraph 5 of the plaintiff's Complaint. The defendants admit the balance of the allegations in paragraph 5.

6. The defendants deny the allegations contained in the first sentence of paragraph 6 of the plaintiff's Complaint. The defendants admit the balance of the allegations in paragraph 6.

7. The defendants deny the allegations contained in the first sentence of paragraph 7 of the plaintiff's Complaint. The defendants admit the balance of the allegations in paragraph 7.

8. The defendants admit the allegations contained paragraph 8 of the plaintiff's Complaint.

9. The defendants admit the allegations contained in paragraph 9 of the plaintiff's Complaint.

10. The defendants admit the allegations contained in paragraph 10 of the plaintiff's complaint.

11. The defendants admit the allegations contained in paragraph 11 of the plaintiff's complaint.

12. The defendants admit the allegations contained in paragraph 12 of the plaintiff's complaint.

13. The defendants admit the allegations contained in paragraph 13 of the plaintiff's complaint.

14. The defendants admit the allegations contained in paragraph 14 of the plaintiff's complaint.

15. The defendants admit the allegations contained in paragraph 15 of the plaintiff's complaint.

16. The defendants admit the allegations contained in paragraph 16 of the plaintiff's complaint.

17. The defendants admit the allegations contained in paragraph 17 of the plaintiff's complaint..

18. The defendants admit the allegations contained in paragraph 18 of the plaintiff's complaint.

19. The defendants admit the allegations contained in paragraph 19 of the plaintiff's complaint.

20. The defendants admit the allegations contained in paragraph 20 of the plaintiff's complaint.

21. The defendants admit the allegations contained in paragraph 21 of the plaintiff's complaint.

22. The defendants admit the allegations contained in paragraph 22 of the plaintiff's complaint.

23. The defendants admit the allegations contained in paragraph 23 of the plaintiff's complaint.

24. The defendants admit the allegations contained in paragraph 24 of the plaintiff's complaint.

25. The defendants admit the allegations contained in paragraph 25 of the plaintiff's complaint.

26. The defendants admit the allegations contained in paragraph 26 of the plaintiff's complaint.

27. The defendants say that they can neither admit nor deny the allegations contained in paragraph 27 of the plaintiff's complaint as it is incomprehensible.

AS TO JURISDICTION AND VENUE

28. The defendants neither admit nor deny the allegations contained in paragraph 28 of the plaintiff's complaint as they are without knowledge or information sufficient to form a

belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

29. The defendants neither admit nor deny the allegations contained in paragraph 29 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

30. The defendants neither admit nor deny the allegations contained in paragraph 30 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

31. The defendants admit the allegations contained in paragraph 31 of the plaintiff's complaint.

32. The defendants deny the allegations contained in paragraph 32 of the plaintiff's complaint.

33. The defendants deny the allegations contained in paragraph 33 of the plaintiff's complaint.

34. The defendants admit so much of the allegations contained in paragraph 34 of the plaintiff's complaint as alleges his property is in Hampden County, and that 23 of the 25 defendants reside in Hampden County but neither admit nor deny the remaining allegations contained in paragraph 34 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

35. The defendants admit so much of the allegations contained in paragraph 35 of the plaintiff's complaint as alleges the two defendants named reside outside of Hampden County ,

but neither admit nor deny the allegations contained in paragraph 35 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

36. The defendants neither admit nor deny the allegations contained in paragraph 36 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

AS TO FACTUAL BACKGROUND

37. The defendants neither admit nor deny the allegations contained in paragraph 37 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

38. The defendants neither admit nor deny the allegations contained in paragraph 38 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

39. The defendants neither admit nor deny the allegations contained in paragraph 39 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

40. The allegations contained in paragraph 40 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 40 of the plaintiff's complaint.

41. The defendants neither admit nor deny the allegations contained in paragraph 41 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

42. The defendants neither admit nor deny the allegations contained in paragraph 42 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

43. The defendants neither admit nor deny the allegations contained in paragraph 43 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

44. The allegations contained in paragraph 44 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 44 of the plaintiff's complaint.

45. The allegations contained in paragraph 45 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 45 of the plaintiff's complaint.

46. The allegations contained in paragraph 46 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 46 of the plaintiff's complaint.

47. The defendants neither admit nor deny the allegations contained in paragraph 47 of the plaintiff's complaint as they are without knowledge or information sufficient to form a

belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

48. The defendants deny the allegations contained in paragraph 48 of the plaintiff's complaint.

49. The defendants deny the allegations contained in paragraph 49 of the plaintiff's complaint.

50. The defendants deny the allegations contained in paragraph 50 of the plaintiff's complaint.

51. The defendants neither admit nor deny the allegations contained in the first sentence of paragraph 51 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. The defendants deny the allegations contained in the second sentence of paragraph 51 of the plaintiff's complaint.

52. The defendants neither admit nor deny the allegations contained in paragraph 52 of the plaintiff's complaint as the document speaks for itself.

53. The defendants deny the allegations contained in paragraph 53 of the plaintiff's complaint.

54. The defendants deny the allegations contained in paragraph 54 of the plaintiff's complaint.

55. The allegations contained in paragraph 55 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 55 of the plaintiff's complaint.

56. The defendants neither admit nor deny the allegations contained in paragraph 56 of the plaintiff's complaint as the document speaks for itself.

57. The defendants deny the allegations contained in paragraph 57 of the plaintiff's complaint.

58. The defendants neither admit nor deny the allegations contained in paragraph 58 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

59. The defendants neither admit nor deny the allegations contained in the first sentence of paragraph 59 of the plaintiff's complaint as the document speaks for itself. The defendants deny the allegations contained in the second sentence of paragraph 59 of the plaintiff's complaint.

60. The defendants neither admit nor deny the allegations contained in paragraph 60 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

61. The defendants neither admit nor deny the allegations contained in paragraph 61 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

62. The defendants deny the allegations contained in the first sentence of paragraph 62 of the plaintiff's complaint. The defendants neither admit nor deny the allegations contained in the second sentence of paragraph 62 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

63. The defendants deny the allegations contained in the first sentence of paragraph 63. The defendants admit that Helen Krieger is a well known member of the Holland community and still a member of the Holland Conservation Commission. The defendants neither admit nor deny the remaining allegations contained in paragraph 63 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

64. The defendants neither admit nor deny the allegations contained in paragraph 64 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

65. The defendants neither admit nor deny the allegations contained in paragraph 65 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible.

66. The defendants neither admit nor deny the allegations contained in paragraph 66 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

67. The allegations contained in paragraph 67 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 67 of the plaintiff's complaint.

68. The allegations contained in paragraph 68 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 68 of the plaintiff's complaint.

69. The defendants say that they need not respond to the allegations contained in paragraph 69 of the plaintiff's complaint as the document speaks for itself.

70. The defendants say that they need not respond to the allegations contained in paragraph 70 of the plaintiff's complaint as the document speaks for itself.

71. The allegations contained in paragraph 71 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 71 of the plaintiff's complaint.

72. The defendants say that they can neither admit nor deny the allegations contained in paragraph 72 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible.

73. The defendants neither admit nor deny the allegations contained in paragraph 73 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

74. The allegations contained in paragraph 74 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 74 of the plaintiff's complaint.

75. The defendants neither admit nor deny the allegations contained in paragraph 75 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

76. The defendants say that they can neither admit nor deny the allegations contained in paragraph 64 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

77. The defendants say that they can neither admit nor deny the allegations contained in paragraph 77 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible.

78. The defendants say that they can neither admit nor deny the allegations contained in paragraph 78 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible. To the extent an answer is required, defendants neither admit nor deny the allegations contained in paragraph 78 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

79. The defendants neither admit nor deny the allegations contained in paragraph 79 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

80. The defendants say that they can neither admit nor deny the allegations contained in paragraph 80 as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

81. The defendants neither admit nor deny the allegations contained in paragraph 81 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

82. The defendants say that they need not respond to the allegations contained in paragraph 82 of the plaintiff's complaint as the document speaks for itself.

83. The defendants say that they need not respond to the allegations contained in paragraph 83 of the plaintiff's complaint as the document speaks for itself.

84. The defendants deny the allegations contained in paragraph 84 of the plaintiff's complaint.

85. The allegations contained in paragraph 85 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants neither admit nor deny the allegations contained in the first sentence of paragraph 85 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. The defendants deny the allegations contained in the second sentence of paragraph 85 of the plaintiff's complaint.

86. The allegations contained in paragraph 86 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 86 of the plaintiff's complaint.

87. The defendants say that they need not respond to the allegations contained in paragraph 87 of the plaintiff's complaint as the document speaks for itself.

88. The defendants say that they need not respond to the allegations contained in paragraph 88 of the plaintiff's complaint as the document speaks for itself.

89. The defendants deny the allegations contained in paragraph 89 of the plaintiff's complaint.

90. The defendants neither admit nor deny the allegations contained in paragraph 90 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

91. The defendants neither admit nor deny the allegations contained in the first sentence of paragraph 91 of the plaintiff's complaint as they are without knowledge or

information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof. The defendants say that they can neither admit nor deny the allegations contained in the remainder of paragraph 91 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible.

92. The defendants say that they need not respond to the allegations contained in paragraph 92 of the plaintiff's complaint as the document speaks for itself.

93. The defendants deny the allegation contained in paragraph 93 of the plaintiff's complaint.

94. The defendants neither admit nor deny the allegations contained in paragraph 94 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

95. The defendants say that they can neither admit nor deny the allegations contained in paragraph 95 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible.

96. The allegations contained in paragraph 96 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 96 of the plaintiff's complaint.

97. The defendants neither admit nor deny the allegations contained in paragraph 97 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

98. The allegations contained in paragraph 98 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 98 of the plaintiff's complaint.

99. The allegations contained in paragraph 99 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 99 of the plaintiff's complaint.

100. The defendants say that they can neither admit nor deny the allegations contained in paragraph 100 of the plaintiff's complaint as they are vague, unlimited in time, and incomprehensible. In further answering, to the extent that paragraph 100 is read to allege wrongdoing on the part of the defendants, the same is denied.

101. The defendants neither admit nor deny the allegations contained in paragraph 101 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

102. The allegations contained in paragraph 101 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants neither admit nor deny the allegations contained in paragraph 102 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

103. The defendants neither admit nor deny the allegations contained in paragraph 103 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

104. The defendants say that they need not respond to the allegations contained in paragraph 104 of the plaintiff's complaint as the document speaks for itself.

105. The defendants say that they need not respond to the allegations contained in paragraph 105 of the plaintiff's complaint as the document speaks for itself.

106. The allegations contained in paragraph 106 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 106 of the plaintiff's complaint.

107. The defendants say that they need not respond to the allegations contained in paragraph 107 of the plaintiff's complaint as the document speaks for itself.

108. The defendants deny the allegations contained in paragraph 108 of the plaintiff's complaint.

109. The defendants deny the allegations contained in paragraph 109 of the plaintiff's complaint.

110. The defendants say that they need not respond to the allegations contained in paragraph 110 of the plaintiff's complaint as the document speaks for itself.

111. The defendants deny the allegations contained in the first clause of paragraph 111 of the plaintiff's complaint. The defendants say that they need not respond to the allegations contained in paragraph 111 of the plaintiff's complaint as the document speaks for itself.

112. The allegations contained in paragraph 112 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 112 of the plaintiff's complaint.

113. The allegations contained in paragraph 113 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 113 of the plaintiff's complaint.

114. The allegations contained in paragraph 114 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants say that they need not respond to the allegations contained in paragraph 114 of the plaintiff's complaint as the document speaks for itself.

115. The defendants say that they need not respond to the allegations contained in paragraph 115 of the plaintiff's complaint as the document speaks for itself.

116. The defendants deny the allegations contained in the first sentence of paragraph 116 of the plaintiff's complaint. The defendants neither admit nor deny the balance of the allegations contained in paragraph 116 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

117. The allegations contained in paragraph 117 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 117 of the plaintiff's complaint.

118. The allegations contained in paragraph 118 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 118 of the plaintiff's complaint.

119. The defendants neither admit nor deny the allegations contained in paragraph 119 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

120. The defendants neither admit nor deny the allegations contained in paragraph 120 of the plaintiff's complaint as they are without knowledge or information sufficient to form a

belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

121. The defendants neither admit nor deny the allegations contained in paragraph 121 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

122. The defendants deny the allegations contained in paragraph 122 of the plaintiff's complaint.

123. The defendants say that they need not respond to the allegations contained in paragraph 123 of the plaintiff's complaint as the document speaks for itself.

124. The defendants say that they need not respond to the allegations contained in paragraph 124 of the plaintiff's complaint as the document speaks for itself.

125. The defendants neither admit nor deny the allegations contained in paragraph 125 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

126. The allegations contained in paragraph 126 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 126 of the plaintiff's complaint.

127. The defendants neither admit nor deny the allegations contained in paragraph 127 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

128. The defendants neither admit nor deny the allegations contained in paragraph 128 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

129. The defendants neither admit nor deny the allegations contained in paragraph 129 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

130. The defendants neither admit nor deny the allegations contained in paragraph 130 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

131. The allegations contained in paragraph 131 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 131.

132. The defendants say that they need not respond to the allegations contained in paragraph 132 of the plaintiff's complaint as the document speaks for itself.

133. The allegations contained in paragraph 133 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants deny the allegations contained in paragraph 133 of the plaintiff's complaint.

134. The allegations contained in paragraph 134 call for a legal conclusion to which the defendants are not obligated to respond. To the extent that an answer is required, the defendants say that they need not respond to the allegations contained in paragraph 134 of the plaintiff's complaint as the document speaks for itself.